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[Additional counsel on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE PLAID INC.
PRIVACY LITIGATION

THIS DOCUMENT
RELATES TO:
ALL ACTIONS

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Master Docket No.: 4:20-cv-03056-DMR

**JOINT DECLARATION OF SHAWN M. KENNEDY,
RACHEL GEMAN, AND CHRISTOPHER J.
CORMIER IN SUPPORT OF PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES, AND
PLAINTIFF SERVICE AWARDS**

Date: May 12, 2022
Time: 1:00 p.m.
Courtroom: *Via* videoconference only
Judge: The Hon. Donna M. Ryu

We, SHAWN M. KENNEDY, RACHEL GEMAN, and CHRISTOPHER J. CORMIER hereby declare as follows:

1. Shawn Kennedy is a member in good standing of the California State Bar and a partner in the law firm of Herrera Kennedy LLP (“HK”). Rachel Geman is a member in good standing of the New York State Bar and a partner in the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP (“LCHB”). Christopher Cormier is a member in good standing of the District of Columbia Bar and a partner in the law firm of Burns Charest, LLP (“BC”). We submit this declaration jointly in support of Plaintiffs’ Motion for Attorneys’ Fees, Reimbursement of Expenses, and Plaintiff Service Awards. Except as otherwise noted, we have personal knowledge of the statements contained in this declaration and, if called to testify, could and would testify competently to them.

2. HK, LCHB, and BC served as Co-Lead Interim Class Counsel from July 29, 2020 until November 19, 2021, when the Court preliminarily appointed them Co-Lead Class Counsel. (Dkts. 57, 153.) In these positions, we have had a primary role in devising the litigation and settlement strategies for the Class, and we have been actively and personally involved in prosecuting and resolving the litigation.

OVERVIEW

3. Prosecution of this complex litigation required an enormous amount of work, effort, and expense by HK, LCHB, and BC (collectively, “Class Counsel”) over more than two years. Throughout this litigation, Class Counsel devoted whatever resources were necessary to see it through to a successful outcome. The following table summarizes the total hours dedicated by Class Counsel to this action between January 2020 and January 25, 2022:

Table 1

Summary of Time Incurred		
Law Firm	Total Hours	Total Lodestar
HK	1,944.9	\$1,811,332.50
LCHB	2,080.8	\$1,296,641.00
BC	1,600.8	\$1,286,262.50

Total	5,626.5	\$4,394,236
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4. These figures are derived from our respective time records, which are prepared contemporaneously in the ordinary course of business. As noted above and described in detail herein, the lodestar resulting from those hours is \$4,394,236.

5. These amounts do not include time that we have written off in the exercise of billing discretion upon review of our law firms' respective time records. Only time and expenses that inured to the benefit of the Class and that advanced the claims resolved in the Settlement have been included in the time and costs presented in Class Counsel's fee motion.

LITIGATION HISTORY

I. Discovery and Investigation of Claims, Filing of Initial Action, and Consolidated Amended Complaint

6. This action did not result from the release of a public statement by Plaid or a news report. Rather, the genesis of this action was Class Counsel's discovery of the privacy breaches alleged in this action, followed by several months of factual and legal investigatory work that Class Counsel undertook beginning in January 2020.

7. As part of the investigation, Class Counsel reviewed numerous videos, message board posts, web pages, submissions to government regulators, podcasts, marketing materials, articles, and other publicly available information. Our investigation included delving into the history and evolution of Plaid's business, including its founding and growth within the fintech industry. We developed an understanding of Plaid's historical and current business practices, as well as the distinctions between its consumer-facing and industry-facing messaging.

8. Class Counsel also gathered information about how Plaid's software worked, including the methods Plaid used to collect data from consumers and deliver that data to its fintech customers. To get a fuller understanding of how Plaid's software worked, we engaged an expert to analyze various aspects of the software, including the nature of the software templates

provided to Plaid clients and the security involved in transmitting login information through Plaid Link.

9. Class Counsel’s investigation led to the filing of an 81-page complaint on May 4, 2020 by plaintiffs James Cottle and Frederick Schoeneman in an action captioned *Cottle et al. v. Plaid Inc.*, No. 4:20-cv-03056-DMR (the “Cottle Action”). (Dkt. 1.) Plaid initially was represented in the Cottle Action by attorneys from the San Francisco and New York offices of Gibson, Dunn & Crutcher LLP. (Dkt. 51.) After several months, Plaid substituted Gibson Dunn for new counsel from the San Francisco office of Cooley LLP. (Dkt. 97.)

10. On July 17, 2020, Plaid, the Cottle Action plaintiffs, and plaintiffs in four subsequently-filed actions filed a stipulation to consolidate the cases and appoint Class Counsel as interim co-lead counsel under Federal Rule of Civil Procedure 23(g). (Dkt. 51.) On July 29, 2020, the Court consolidated the Cottle Action with the four related actions (collectively, the “Action”), and appointed Class Counsel as interim co-lead counsel. (Dkt. 57.) On August 5, 2020, consolidated Plaintiffs filed the 105-page Consolidated Amended Class Action Complaint (“CAC”). (Dkt. 61.)

II. Plaid’s Motion to Dismiss

11. On September 14, 2020, Plaid filed a 38-page motion to dismiss the CAC in its entirety. (Dkt. 78.) Plaid argued, among other things, that (1) Plaintiffs lacked standing to pursue any of their claims, including because they had not sufficiently pled an injury in fact; (2) most of Plaintiffs’ claims were barred by relevant statutes of limitations; (3) Plaintiffs’ equitable claims were barred; (4) Plaintiffs failed to plead actionable claims under the Stored Communications Act, 18 U.S.C. §§ 2701 *et seq.* (“SCA”), Computer Fraud and Abuse Act, 18 U.S.C. § 1030 (“CFAA”), or the Computer Data and Access Fraud Act, Cal. Penal Code § 502 (“CDAFA”); (5) Plaintiffs failed to allege economic harm under the Unfair Competition Law, Cal. Bus. & Prof. Code §§ 17200 *et seq.* (“UCL”); (6) Plaintiffs failed to plead common-law claims for invasion of privacy, violation of the California Constitution (Article I, Section I), or deceit; and (7) Plaintiffs failed to plead a claim under California’s Anti-Phishing Act of 2005, Cal. Bus. & Prof. Code § 22948 *et seq.* (“CAPA”).

12. On November 17, 2020, Plaintiffs filed a 45-page opposition to Plaid's motion to dismiss, arguing that each of the claims in the CAC was adequate under the relevant standards. (Dkt. 108.) On December 11, 2020, Plaid filed its 22-page reply brief. (Dkt. 111.)

13. On February 11, 2021, the parties participated in a hearing on Plaid's motion to dismiss. On April 30, 2021, the Court issued an order granting in part Plaid's motion, dismissing with prejudice Plaintiffs' claims for declaratory and injunctive relief and their claims under the SCA, CFAA, CDAFA, and UCL, and sustaining Plaintiffs' invasion of privacy/intrusion into private affairs and unjust enrichment claims for a nationwide class, as well as their claims for deceit, violations of the California Constitution, and violations of CAPA for a California class. (Dkt. 125.)

III. Formal and Informal Discovery

14. Shortly after the Cottle Action was filed, the Court set an initial Case Management Conference for August 5, 2020. (Dkt. 10.) On July 27, 2020, the Cottle Action plaintiffs filed an administrative motion to continue the initial CMC, explaining that it was necessary to do so pending the Court's decision on the parties' then-pending stipulation to consolidate the related actions, but that Plaid refused to agree to a short continuance and instead indicated that it would only agree to a continuance until a date after the Court ruled on a motion to dismiss. (Dkt. 54.) Plaid thus sought to indefinitely delay discovery. But on July 29, 2020, the Court granted Plaintiffs' request, continuing the initial CMC to October 7, 2020. (Dkt. 58.)

15. On September 14, 2020, Plaid filed a motion styled as an "Administrative Motion to Continue Case Management Conference," in which Plaid requested that the Court continue the initial CMC and related deadlines, including the Rule 26(f) report and initial disclosures, until after the Court ruled on the motion to dismiss. (Dkt. 83.) Plaid thus made a second attempt to stay discovery pending its motion to dismiss. Plaintiffs opposed Plaid's motion, arguing that discovery should be allowed to proceed on schedule. On September 25, 2020, the Court denied Plaid's motion, finding that it failed to meet its burden to demonstrate that a discovery stay was appropriate. (Dkt. 89.)

1 16. On October 7, 2020, the Court conducted the first Case Management Conference.
2 At the CMC, Plaid renewed its request that the Court stay discovery pending its ruling on Plaid's
3 motion to dismiss. Class Counsel again opposed Plaid's request, asking the Court to allow
4 discovery to proceed. The Court again denied Plaid's request, ruling that discovery was open.

5 17. On October 27, 2020, Plaintiffs served a First Set of Requests for Production to
6 Plaid. On March 19, 2021, Plaintiffs served Plaid with a First Set of Requests for Admission and
7 a First Set of Interrogatories. On April 20, 2021, Plaintiffs served a Second Set of Requests for
8 Production to Plaid. In all, Class Counsel served—and Plaid responded to—57 document
9 requests, 21 interrogatories, and 51 requests for admissions.

10 18. In responding to Plaintiffs' written discovery requests, Plaid initially avoided
11 committing to produce responsive documents and information, instead asserting objections and
12 stating that it would meet and confer with Class Counsel regarding the scope of terms used in
13 Plaintiffs' requests.

14 19. As a result, Class Counsel embarked upon a months-long process of meeting and
15 conferring with Plaid about its obligations to produce relevant documents and information as
16 requested. Class Counsel began that process on December 23, 2020, and it did not conclude until
17 May 8, 2021. Over that period, Class Counsel participated in dozens of telephonic and written
18 meet-and-confer sessions, expending a great deal of time and effort to hold Plaid accountable for
19 its obligations to produce key relevant documents. Class Counsel pushed throughout that time for
20 documents and information related to issues such as the nature of Plaid's software and data
21 collection practices, the data Plaid provided to its clients, the revenues Plaid earned, the internal
22 policies and procedures in place at Plaid, the consumer disclosures employed by Plaid at various
23 points, and the agreements between Plaid and various financial institutions as well as between
24 Plaid and its clients.

25 20. These issues were highly contested. Plaid eventually agreed to produce certain
26 categories of documents, while continuing to push back on others. When it appeared that the
27 parties had reached an impasse, Class Counsel ultimately teed up motions to compel on several
28

1 issues. But just before those motions would have been filed, Plaid agreed to multiple
2 compromises and to produce the documents Plaintiffs requested.

3 21. Plaid ultimately produced over 12,000 pages of documents, including internal
4 policies and procedures, agreements, correspondence, investigatory materials, client lists, and
5 detailed financial information.

6 22. During this same time period, Class Counsel commenced third-party discovery as
7 well, subpoenaing JP Morgan Chase and starting discussions with other banks. Class Counsel
8 also responded to a set of document requests served by Plaid. In addition, Class Counsel engaged
9 a forensic consultant to preserve data from the named Plaintiffs, and oversaw the preservation of
10 data from several Plaintiffs' personal mobile devices.

11 23. Class Counsel also sought and received significant discovery from Plaid as part of
12 the mediation and negotiation process that led to the Settlement. In response to informal
13 discovery requests, Plaid provided further information, internal documents, and data that shed
14 light on the nature and function of Plaid's software and business practices during the class period,
15 its finances, and the size and scope of the potential class, among other things. Prior to the
16 mediation, for example, the parties participated in a technology tutorial session with Judge
17 Gandhi, in which Plaid's businesspeople explained aspects of Plaid's technology and business
18 model. After reaching agreement on settlement terms with Plaid, Class Counsel sought and
19 received confirmatory discovery from Plaid as well.

20 24. As a result of the significant discovery provided by Plaid, Class Counsel were able
21 to properly assess the value of the Class's claims and negotiate a fully-informed settlement that
22 maximizes the financial recovery available to the Class and provides important injunctive relief
23 designed to substantially remedy the alleged misconduct going forward while avoiding litigation
24 risks that were brought to light in the process.

25 **IV. Mediation and Settlement**

26 25. Between February 2021 and July 2021, the Parties engaged in lengthy and
27 contentious arm's-length negotiations to resolve the claims in the Action. On February 16, 2021,
28 the Parties engaged in a full-day mediation session with the Hon. Jay Gandhi (ret.). Prior to the

1 mediation, the parties prepared detailed mediation briefs outlining their positions on the strengths
2 and weaknesses of the case. The Parties went into the mediation with substantially different
3 positions relating to appropriate settlement terms and did not resolve the Action at the initial
4 mediation session.

5 26. For the next several months, while the parties continued to litigate, they continued
6 to engage in the mediation process with Judge Gandhi, who helped bridge the gap between their
7 positions.

8 27. The parties held another mediation session on April 13, 2021. Before and after that
9 mediation session, the parties engaged in extensive communications with each other and Judge
10 Gandhi regarding points of contention and additional information required to move discussions
11 forward.

12 28. On June 7, 2021, Judge Gandhi made a mediator's proposal for a class-wide
13 settlement for \$58 million subject to the parties' negotiation of, and agreement to, appropriate
14 injunctive relief. That recommendation was accepted by all parties in a double-blind process on
15 June 11, 2021. Over the next six weeks, the parties negotiated the terms of a long-form settlement
16 agreement, including injunctive relief. These negotiations ultimately resulted in the Settlement
17 Agreement, which was executed on July 30, 2021.

18 29. The negotiations of the Settlement Agreement were intense and included multiple
19 lengthy telephone conferences and extensive email correspondence, as well as the exchange of
20 multiple drafts of the proposed Settlement Agreement and related materials.

21 30. During the negotiation process, the parties were at many times far apart and often
22 at odds. The mediator's direct resolution of disputes was required, at times, to prevent the
23 discussions from collapsing altogether.

24 31. Throughout the mediation and settlement process, Class Counsel vigorously
25 pursued the best interests of the putative Class. In negotiating the Settlement Agreement, the
26 parties negotiated at arms' length and did not engage in substantive negotiation about or reach
27 any agreement concerning the amount of attorneys' fees that should be awarded, reimbursement
28

1 of expenses, or class representative service awards. At no point did Class Counsel seek to
 2 advance their own interests over those of the Class.

3 32. Certain differences between the proposed litigation classes reflected in the CAC
 4 and the Settlement Class reflect Class Counsel's determination, based upon information learned
 5 through formal and informal discovery, that (1) the challenged aspects of Plaid's software and
 6 conduct apply to the users of a broader set of fintech apps and services than those enabling
 7 payments and money transfers; and (2) the "OAuth Process" and "Managed OAuth Process" that
 8 Plaid employed with certain financial institutions at certain points in time should be excluded
 9 from the Class. The Settlement Class is thus broader in that it includes users of more fintech apps
 10 and narrower in that it excludes users who connected to their accounts using a different process
 11 than was described in the CAC.

12 33. On August 6, 2021, Class Counsel filed the Motion for Preliminary Approval of
 13 Class Action Settlement, including a description of the monetary and injunctive relief provided by
 14 the Settlement and a notice plan prepared by Angeion Group, LLC. (Dkts. 137, 138, 139.)
 15 Following a hearing on September 30, 2021, the Court granted preliminary approval of the
 16 Settlement on November 19, 2021. (Dkt. 153.)

17 34. Should the Court approve the Settlement, Class Counsel will continue to
 18 vigorously represent the interests of the Class throughout settlement administration.

19 **CHARACTERISTICS OF THE CLASS**

20 35. Class Counsel estimates that the Settlement Class reflected in the Settlement
 21 Agreement includes approximately 98 million individuals. That estimate is based upon an internal
 22 analysis performed by Plaid of its own data in 2020.

23 **WORK PERFORMED BY CLASS COUNSEL**

24 36. Each of our law firms has categorized their time spent in this litigation according
 25 to the nature of the task. **Exhibits A, B, and C** hereto are summaries describing the amount of
 26 time spent by each attorney and staff member whose time is included in Class Counsel's total
 27 lodestar, as divided among each of the following ten categories:
 28

1 37. The **Lead Counsel Calls / Meetings** category includes communications and
2 conferences between and among Class Counsel.

3 38. The **Investigations / Factual Research** category includes all work and research
4 required to develop knowledge of facts related to the claims alleged on behalf of the Class;
5 research concerning the impact of Plaid's conduct on Plaintiffs and putative Class members;
6 communications with the Class Representatives regarding the allegations included in the initial
7 complaints and the CAC; and ongoing analysis of relevant technical and other developments
8 throughout the course of the litigation.

9 39. The **Discovery (Draft / Respond / Meet & Confer)** category includes work to
10 form a discovery plan; drafting of discovery requests and responses; meeting and conferring on
11 discovery responses; communications and conferences regarding evidence and information
12 provided by Plaid through formal and informal discovery; planning, drafting and serving third-
13 party discovery; meeting and conferring with third parties' counsel; and coordination and
14 communication with the Class Representatives and, where applicable, their counsel regarding the
15 location of potentially relevant evidence and information, evidence preservation, and the
16 provision of personal information.

17 40. The **Discovery (Document Review)** category includes review and analysis of
18 documents and data produced by Plaid through formal and informal discovery.

19 41. The **Pleadings, Briefs, Motions** category includes drafting, review, and filing of
20 all pleadings, briefs, and motions before the Court, including without limitation the CAC, status
21 reports and case management statements, and the opposition to Plaid's motion to dismiss.

22 42. The **Court Appearances & Preparation** category includes all conferences and
23 other tasks undertaken to prepare for hearings, case management conferences, and other
24 appearances before the Court; the analysis and preparation of materials for use in Court
25 appearances; and time spent in appearances before the Court.

26 43. The **Settlement** category includes strategy, analysis, correspondence, and
27 conferences related to settlement negotiations; drafting of mediation briefs, term sheets, and the
28 Settlement Agreement; preparation and conduct of each mediation and settlement conference;

preparation and filing of the settlement approval briefing and associated exhibits; evaluating and selecting a Settlement Administrator; oversight of the scope and implementation of the notice program; research and selection of proposed *cy pres* recipients; and communications with defense counsel, Class Representatives, class members, and the Court regarding the Settlement.

44. The **Case Management & Litigation Strategy** category includes time spent developing and furthering a cohesive and comprehensive case strategy and goals; analysis of relevant developments in case law and other areas; management of the case file, including administrative work; the allocation of work among counsel, and all related oversight.

45. The **Legal Research** category includes research and analysis regarding substantive and procedural legal issues.

46. The **Experts / Consultants** category includes time incurred to identify and retain consulting experts, as well as consultations to assist with preparation of the initial complaint in the Cottle Action.

47. We, and attorneys under our supervision, reviewed the time records kept by our respective law firms for purposes of this declaration and assigned each time entry to one of the ten categories described above, which were distributed by Class Counsel to all Plaintiffs' counsel in this litigation. The total hours and lodestar incurred by Class Counsel for each of the ten categories are detailed in Table 2 below.

Table 2

Lodestar and Rates by Category		
Category	Total Hours	Total Lodestar
Lead Counsel Calls / Meetings	390.8	\$332,359.00
Investigations / Factual Research	462.7	\$392,851.50
Discovery (Draft / Respond / Meet & Confer)	714.4	\$528,447.50
Discovery (Document Review)	39.1	\$32,562.50
Pleadings, Briefs, Motions	1,330.2	\$1,022,038.50
Court Appearances & Preparation	297.8	\$241,689.00
Settlement	1,055.1	\$842,240.50

Case Management & Litigation Strategy	817.2	\$571,284.50
Legal Research	433.2	\$362,315.00
Experts / Consultants	86	\$68,448.00
Totals	5,626.5	\$4,394,236

48. These submitted hours do not include every hour reported, even by Class Counsel. They do not include timekeepers from Class Counsel who billed less than 10 total hours. They also do not include time from other counsel representing named Plaintiffs, who made contributions to the Action, but collectively submitted a relatively small number of hours compared to Class Counsel. The above amounts also do not include the additional time that Class Counsel will spend going forward in seeking approval of, and implementing, the Settlement, including responding to inquiries from Class Members and overseeing distribution of the Settlement Fund. Based on prior experience, these responsibilities may require a significant further time commitment from Class Counsel. If there are objections to the Settlement and subsequent appeals, those commitments and responsibilities may extend for several more years.

49. The time that Class Counsel spent on this case has been completely contingent on the outcome. We prosecuted this case on a purely contingent basis and agreed to advance all necessary expenses, to the exclusion of other fee-generating work, knowing that we would receive a fee and be reimbursed our expenses only if we obtained meaningful relief on a class-wide basis.

50. Additional work will be required to obtain final approval of the Settlement; to protect the Settlement on appeal (if any appeals are lodged); to respond to inquiries from Class Members about their rights and relief provided by the Settlement; to oversee and monitor Plaid's compliance with the injunctive relief provided by the Settlement; to oversee the distribution and allocation of any *cy pres* funding awarded by the Court; and to ensure and report on compliance by each *cy pres* recipient with the terms of the Settlement.

51. Based on our experience with other class actions and complex cases, we believe that the time expended in connection with this matter was necessary to ensure the success of the action and reasonable in amount, particularly given the result achieved by the Settlement and the novelty and complexity of the litigation.

CLASS COUNSEL'S HOURLY RATES

52. This case involves Plaid's actions in collecting and handling some of the most private of all consumer information: banking login credentials and detailed financial data for tens of millions of people. At issue are novel and untested claims for violation of CAPA (with attendant statutory penalties) as well as claims for invasion of privacy/intrusion into private affairs, unjust enrichment, deceit, and violations of the California Constitution. These issues were disputed in a highly technical context that required our attorneys and consulting experts to apply expertise in the functioning of the Plaid Link interface in various fintech apps, Plaid's use of different methods for collecting data from financial institutions, and Plaid's delivery and use of banking data to its clients. These and other difficult issues implicated by these claims required us to research and devise litigation strategies to move the case through motion practice and contentious merits discovery towards trial, without the certainty of ever receiving compensation. The hourly rates utilized in the lodestar calculation include no risk multiplier.

53. The rates sought for each law firm's attorneys and staff are the firm's current commercial billing rates, which have been approved and paid in other cases, and are supported by Class Counsel's extensive and specialized experience in these types of cases and recognized expertise, as described below for each of HK, LCHB, and BC, respectively.

Herrera Kennedy (by Shawn Kennedy)

54. HK is a litigation firm that routinely leads high-stakes, novel, and complex contingency and class action cases. HK's partners have been entrusted with leadership roles in significant antitrust and consumer class actions and have discovered, initiated, and pursued groundbreaking *qui tam* actions alleging anticompetitive conduct by some of the largest and most well-represented companies in the world. Over the last three years, HK's partners have recovered over \$200 million in damages on behalf of injured consumers in exceedingly large and

1 complicated class actions. More information on HK can be found at the firm's website,
2 <http://herrerakennedy.com>.

3 55. HK's audited lodestar of \$1,811,332.50 through January 25, 2022, reflects 1,944.9
4 hours of work by highly qualified attorneys. This case was litigated by HK partners Shawn
5 Kennedy, Nico Herrera, and Bret Hembd, with additional work contributed by Laura Seidl and
6 Andrew Purdy.

7 56. **Shawn Kennedy** received his JD in 2001 from Duke University School of Law.
8 He has over 20 years of experience handling class actions and other complex litigation matters.
9 He has litigated numerous high-stakes consumer class actions involving securities, antitrust and
10 consumer fraud claims. In addition, as the founder of technology companies in the legal and
11 financial industries, he has extensive experience and substantive knowledge regarding cloud-
12 based technology; software development; security and privacy; and data storage and analytics.
13 This experience and knowledge proved invaluable in allowing him to uncover Plaid's wrongful
14 conduct alleged in this action. He had primary responsibility for guiding the investigation and
15 development of the factual allegations and claims in this case. Prior to joining HK, he practiced
16 with international law firms Morgan, Lewis & Bockius LLP, and Howrey LLP, where he was
17 selected as a "Rising Star" by Super Lawyers and was selected as Attorney of the Year by the
18 Public Law Center.

19 57. **Nicomedes Sy Herrera** received his JD in 1997 from Columbia Law School,
20 where he was a Harlan Fiske Stone Scholar. He is a strategic litigator with over 24 years of
21 experience litigating a broad range of complex, high-impact privacy, antitrust, and consumer class
22 actions, derivative suits, and *qui tams*. He investigated and commenced a groundbreaking series
23 of billion dollar *qui tam* lawsuits against some of the largest pharmaceutical manufacturers based
24 on the drug companies' assertion of fraudulently-procured patents to exclude generic competition.
25 Prior to joining HK, he also held senior executive and general counsel positions for several New
26 York and Chicago-based financial services firms. He has been selected as a "Super Lawyer" and
27 a "Rising Star" by Super Lawyers.
28

58. **Bret D. Hembd** received his JD from Yale Law School in 2010, where he served as an Editor of The Yale Law Journal. He is an accomplished litigator who represents individuals and companies in a broad array of business litigation in state and federal court. With his partners, he has litigated high-stakes consumer class actions and *qui tam* lawsuits in federal courts across the nation. Prior to joining HK, he practiced at Irell & Manella LLP. He has been selected as a “Rising Star” by Super Lawyers each year from 2017 to 2022.

59. **Laura E. Seidl** received her JD from New York Law School in 2008. She is a skilled litigator with a history of outstanding success representing people from all walks of life. Her clients have ranged from private equity investors litigating complex derivative lawsuits with hundreds of millions of dollars at stake to individuals suffering homelessness during the Bay Area housing crisis.

60. HK’s customary rates, which were used for purposes of calculating HK’s lodestar reflected in Exhibit A, are consistent with prevailing rates in this District and have been billed to and paid by HK’s hourly clients. *See also In re Capacitors Antitrust Litig.*, No. 3:17-md-02801-JD, 2020 U.S. Dist. LEXIS 209514, at *64–65 (N.D. Cal. Nov. 7, 2020) (approving HK partner’s fees at prior firm as part of total award of \$69.6 million in fees); *In re Restasis (Cyclosporine Ophthalmic Emulsion) Antitrust Litig.*, No. 18-MD-2819 (NG) (LB), 2020 U.S. Dist. LEXIS 198674, at *26–27 (E.D.N.Y. Oct. 6, 2020) (approving HK partner’s fees at prior firm as part of total award of \$16.4 million in fees); *In re HP Printer Firmware Update Litig.*, No. 5:16-cv-05820-EJD, 2019 U.S. Dist. LEXIS 108959, at *8–9 (N.D. Cal. June 28, 2019) (approving HK partner’s fees at prior firm as part of total award of \$2.75 million in fees).

Lieff, Cabraser, Heimann & Bernstein (by Rachel Geman)

61. LCHB is one of the oldest, largest, most-respected, and most-successful class action firms in the country, and has recovered billions of dollars for class members. The firm brings to the table extensive experience litigating and settling consumer and privacy class actions and other complex matters, and has played a lead role in prosecuting numerous privacy class actions, including: *In re Google Location History Litigation*, No. 18-05062 (N.D. Cal.) (Co-Lead Class Counsel); *Campbell v. Facebook*, No. 13-05996 (N.D. Cal.) (Co-Lead Class Counsel);

1 *Perkins v. LinkedIn Corp.*, No. 13-04303 (N.D. Cal.) (Co-Lead Class Counsel); *Corona v. Sony*
 2 *Pictures Entertainment, Inc.*, No. 14-09600 (C.D. Cal.) (Co-Lead Class Counsel); *Ebarle et al. v.*
 3 *LifeLock Inc.*, No. 15-00258 (N.D. Cal.) (Co-Lead Class Counsel); and *Matera v. Google LLC*,
 4 No. 15-04062 (N.D. Cal.) (Co-Lead Class Counsel). More information on LCHB can be found at
 5 the firm's website, www.lieffcabraser.com.

6 62. LCHB's audited lodestar of \$1,296,641 through January 25, 2022, reflects
 7 2,080.80 hours of work by highly qualified attorneys, as addressed in the following paragraphs.

8 63. **Rachel Geman** received her J.D. in 1997 from Columbia Law School, with
 9 honors. In addition to serving as Co-Lead counsel in this matter, Ms. Geman is active in the
 10 firm's consumer, false claims, and employment practice groups. She presently serves on the
 11 Plaintiffs' Steering Committee in contaminated drug litigation (Valsartan) and is proposed co-
 12 lead class counsel for medical monitoring; represents a certified class of women in employment
 13 discrimination litigation against Goldman Sachs; is co-lead counsel in kickback litigation against
 14 AbbVie; and represents multiple whistleblowers in complex matters. Ms. Geman has been co-
 15 lead counsel or counsel of record in consumer and other complex litigation that has resolved in
 16 the N.D. Cal. *See In re: Bank of Am. Credit Protection Marketing & Sales Practices Litig.*, No.
 17 11-02269 (N.D. Cal.) (Ms. Geman and LCHB were co-lead class counsel); *Brazil v. Dell*, No. 7-
 18 01700 (N.D. Cal.) (LCHB co-lead class counsel); and *In re Axa Rosenberg Inv. Litig.*, No. 11-
 19 00536 (N.D. Cal.) (LCHB co-lead class counsel)]. Ms. Geman chairs NELA-NY's amicus
 20 committee and is a frequent writer and speaker on topics in complex litigation. Ms. Geman has
 21 been selected for inclusion by peers in The Best Lawyers in America in the field of "Employment
 22 Law - Individuals" from 2012-2022. She was named among the "Lawdragon 500 Leading
 23 Plaintiff Financial Lawyers in America" in 2021, "Lawdragon 500 Leading Plaintiff Employment
 24 Lawyers in America" from 2018-2021, and "Lawdragon 500 Leading Plaintiff Consumer
 25 Lawyers" in 2019.

26 64. **Michael Sobol** is the Chair of LCHB's Cybersecurity and Data Privacy practice
 27 group. Mr. Sobol received his J.D. in 1989 from Boston University School of Law. Since joining
 28 LCHB in 1997, Mr. Sobol has represented plaintiffs in numerous nationwide consumer

1 protection, data privacy and other class actions and complex matters. Mr. Sobol is widely
 2 recognized for his expertise and substantial experience in the area of digital privacy and security,
 3 including most recently by the Daily Journal as a “Top Cyber/Artificial Intelligence Lawyer,”
 4 2018-2019; by Law360 as “MVP for Cybersecurity and Privacy” in 2017; and by the National
 5 Law Journal as “Cybersecurity & Data Privacy Trailblazer” in 2017.

6 65. **Melissa Gardner** received her J.D. in 2011 from Harvard Law School. Ms.
 7 Gardner joined LCHB as an associate in 2012 and became a partner at the firm in 2019. Ms.
 8 Gardner focuses her practice on representing plaintiffs in consumer protection and digital privacy
 9 class action litigation, and has significant experience with class action consumer privacy litigation
 10 involving claims under the Wiretap Act. Ms. Gardner has been selected by Super Lawyers as a
 11 “Rising Star for Northern California” each year from 2017-2020.

12 66. **Mike Sheen** received his J.D. in 2012 from the University of California, Berkeley.
 13 His practice centers on securities and financial fraud and consumer and data privacy fraud
 14 matters. Prior to joining the firm in 2018, Mr. Sheen served as a law clerk to the Honorable Dale
 15 A. Drozd of the U.S. District Court for the Eastern District of California. He was also an associate
 16 at Milbank, Tweed, Hadley & McCloy LLP, where his practice focused on intellectual property
 17 and commercial litigation.

18 67. **Rhea Ghosh** received her J.D. in 2016 from the University of Pennsylvania Law
 19 School. Before coming to Lieff Cabraser, Ms. Ghosh served as a judicial clerk to the Honorable
 20 Charles S. Haight, Jr. of the Southern District of New York and also was an associate at Kirkland
 21 & Ellis LLP. Presently, Ms. Ghosh is clerking on the Tenth Circuit Court of Appeals.

22 68. **Madeline Gomez** received her J.D in 2015 from Columbia Law School where she
 23 served as the Executive Editor and Notes Editor for the Columbia Journal of Gender and Law and
 24 won the Myra Bradwell Award for the best student note on women and the law and the Pauline
 25 Berman Heller Prize for the most outstanding record of academic achievement in the service of
 26 gender equality. Ms. Gomez served as a law clerk for the Honorable Martha Craig Daughtrey of
 27 the U.S. Court of Appeals for the Sixth Circuit. Ms. Gomez worked on this case in its early
 28 stages.

69. **Nicholas Hartmann** received his J.D. in 2014 from the University of California, Irvine School of Law. Prior to joining the firm, Mr. Hartmann served as a judicial clerk to the Honorable Andrew J. Peck of the U.S. District Court for the Southern District of New York and to the Honorable Eric L. Clay of the U.S. Court of Appeals for the Sixth Circuit. He was also an associate at Patterson Belknap Webb & Tyler LLP, New York City. Mr. Hartmann began work on this case when it was in its settlement posture.

70. **Ariana Delucchi** is a paralegal. She obtained her Bachelor of Arts from the University of San Francisco in 2010 and her Paralegal Studies Certificate from San Francisco State University in 2017.

71. LCHB's customary rates, which were used for purposes of calculating LCHB's lodestar reflected in Exhibit B, are consistent with prevailing rates in this District and repeatedly have been approved by federal courts in this Circuit: *See, e.g., In re Volkswagen "Clean Diesel" Mktg., Sales Practices, & Prod. Liab. Litig.*, MDL 2672, Dkt. No. 3489 (N.D. Cal. July 21, 2017) (approving in lodestar cross-check rates of Class Counsel, including LCHB, which ranged "from \$250 to \$1,650 for partners, \$185 to \$850 for associates, and \$65 to \$390 for paralegals"); *In re Intuit Data Litig.*, No. 15-1778, 2019 WL 2166236, at *2 (N.D. Cal. May 15, 2019) (awarding requested attorneys' fees); *Campbell et al. v. Facebook, Inc.*, No. 13-05996, Dkt. No. 253 (N.D. Cal. August 18, 2017) (approving LCHB rates); *Allagas v. BP Solar Int'l, Inc.*, No. 14-00560, 2016 WL 9114162, at *2 (N.D. Cal. Dec. 22, 2016) (approving LCHB rates as "in line with prevailing rates in this District"); *Perkins v. LinkedIn Corp.*, No. 13-CV-04303, 2016 WL 613255, at *15 (N.D. Cal. Feb. 16, 2016) (approving LCHB rates); *In re High-Tech Employee Antitrust Litig.*, No. 11-02509, Dkt. No. 1112 (N.D. Cal. Sept. 2, 2015) (approving LCHB rates); *In re TracFone Unlimited Serv. Plan Litig.*, 112 F. Supp. 3d 993, 1009 (N.D. Cal. 2015) (awarding requested attorneys' fees); *Steinfeld v. Discover Financial Services*, No. 3:12-01118 (N.D. Cal. Mar. 31, 2014) ("Class counsel have submitted declarations that show the hourly rates that they have requested are reasonable and have provided the Court with information about other cases that approved their rates."); *In re: Toyota Motor Corp. Unintended Acceleration Marketing, Sales Practices, and Products Liability Litig.*, No. 10-ml-02151, Dkt. No. 3933 (C.D. Cal. June

24, 2013) (awarding requested fees and finding that “[c]lass counsel’s experience, reputation, and skill, as well as the complexity of the case” justified billing rates).

Burns Charest LLP (by Christopher Cormier)

72. BC is a boutique trial firm that represents individuals, businesses, and classes in complex, high-value disputes, primarily in the fields of antitrust, privacy, intellectual property, energy, and mass torts. Founded in 2015 by former Susman Godfrey LLP partners and associates, its partnership now includes former partners of other prominent firms like Arnold & Porter LLP and Cohen Milstein Sellers & Toll PLLC. With offices in Dallas, New Orleans and Washington, DC, the firm has quickly gained a reputation as one of the preeminent complex plaintiff-side litigation firms in the nation. The firm has obtained judgments and settlements totaling well into the hundreds of millions of dollars for their clients as lead counsel in various class actions and mass torts and for individual and corporate clients in various business disputes. The firm and its lawyers have been repeatedly ranked by preeminent legal publications such as Benchmark Litigation, Best Lawyers in America, Chambers and Partners, Global Competition Review, Lawdragon, and Super Lawyers. More information on BC can be found at the firm’s website, <https://www.burnscharest.com>.

73. BC’s audited lodestar of \$1,286,262.50 through January 25, 2022, reflects 1,600.80 hours of work by highly qualified attorneys and support staff. This case primarily was litigated by BC partners Christopher J. Cormier and Warren T. Burns, with additional work contributed by associates and paralegals.

74. **Christopher J. Cormier** has led BC’s investigation, litigation, and settlement efforts in this case. He graduated *magna cum laude* from American University’s Washington College of Law in 2002 and earned a BA in Government from the University of Virginia in 1999. He has 20 years of experience handling antitrust, privacy and other class actions as well as representing business clients in high-value commercial litigation. After spending the first 16 years of his career as an associate and partner at Cohen Milstein Sellers & Toll PLLC, he moved to BC in 2018. He has served as court-appointed co-lead counsel in numerous antitrust class actions resulting in successful settlements and verdicts exceeding \$1.5 billion, including *In re Urethane*

1 *Antitrust Litigation* (D. Kan.), where he served on the trial team that secured the largest price-
 2 fixing verdict in the history of the Sherman Antitrust Act. Federal courts across the country also
 3 have personally appointed him co-lead counsel in various successful antitrust and other class
 4 actions. A leading publication notes that he is “lauded as ‘an excellent competition plaintiff
 5 lawyer’ who is regularly engaged in high-value antitrust proceedings before state and federal
 6 courts.” He has been named to the Lawdragon 500 Leading Plaintiff Financial Lawyers guide
 7 (2021) and the Lawdragon 500 Leading Plaintiff Consumer Lawyers guide (2021), honored as
 8 one the globe’s top plaintiffs’ antitrust lawyers in the Global Competition Review’s Who’s Who
 9 Legal: Competition (2020), selected to the Best Lawyers in America (2020-2022), called a
 10 “Rising Star” in the field of Antitrust Litigation by Super Lawyers (2016-2017), and recognized
 11 by Benchmark Plaintiff as an Antitrust Litigation Star (2013-2015).

12 75. **Warren T. Burns** graduated *summa cum laude* and Order of the Coif in 2004
 13 from Tulane Law School, where he served as Editor in Chief of the Tulane Law Review. After
 14 law school, he clerked for the Hon. Paul J. Kelly, Jr. on the U.S. Court of Appeals for the Tenth
 15 Circuit, and then joined Susman Godfrey LLP, where was an associate and then partner. He co-
 16 founded BC in 2015 and serves as the firm’s co-managing partner. He has served as co-lead
 17 counsel in numerous antitrust and other class actions and as counsel for numerous individuals and
 18 companies in commercial litigations and arbitrations. He has obtained settlements and verdicts for
 19 his clients well into the hundreds of millions of dollars. He is an elected member of the American
 20 Law Institute, is a Fellow of the American Bar Foundation, and sits on the Board of Advisory
 21 Editors of the Tulane Law Review. He has been honored by the following legal publications:
 22 Texas Rising Stars (2011-2015), Texas Super Lawyers (2019-2021), International Who’s Who of
 23 Competition Lawyers (2014-2021), Top 100 National Trial Lawyers (2015-2016, 2020), Best
 24 Lawyers in Dallas (2020), Best Lawyers in America (2019-2022), Lawdragon 500 Leading
 25 Plaintiff Consumer Lawyers (2021), and Lawdragon 500 Leading Plaintiff Financial Lawyers
 26 (2021).

27 76. BC’s customary rates, which were used for purposes of calculating BC’s lodestar
 28 reflected in Exhibit C, are consistent with prevailing rates in this District and elsewhere and have

1 been billed to and paid by BC's clients. *See, e.g., In re EpiPen (Epinephrine Injection, USP)*
 2 *Marketing, Sales Practices and Antitrust Litig.*, MDL No. 2785, 2021 WL 5369798, at *4-5 (D.
 3 Kan. Nov. 17, 2021) (granting requested attorney fees representing specified multiplier of hourly
 4 rates of Burns Charest and other co-lead counsel in class action settlement); *In re Anadarko Basin*
 5 *Oil and Gas Lease Antitrust Litig.*, No. CIV-16-209-HE, 2019 WL 1867446, at *1-3 (W.D. Okla.
 6 Apr. 25, 2019) (granting requested attorney fees representing specified multiplier of hourly rates
 7 of Burns Charest and other co-lead counsel set forth in co-lead counsel declaration in class action
 8 settlement).

9 **EXPENSES INCURRED BY PLAINTIFFS' COUNSEL**

10 77. Class Counsel seek reimbursement of \$115,920.21 in litigation expenses. As
 11 detailed in Exhibit D, to date HK has incurred expenses totaling \$33,052.40; LCHB has incurred
 12 expenses totaling \$48,857.80; BC has incurred expenses totaling \$27,843.03; these expenses are
 13 reflected in our respective books and records as maintained in the ordinary course of business. As
 14 also detailed in Exhibit D, the other counsel representing named Plaintiffs have reported expenses
 15 totaling \$6,166.98.

16 78. The expenses incurred by Plaintiffs' counsel include consultant fees, mediation
 17 costs, and other customary litigation expenses. Table 3 below provides an overview of those
 18 expenses broken down by expense category:

19 **Table 3**

Expenses by Category	
Category	Cumulative Expense
Electronic Research (Lexis/Westlaw/Pacer)	\$21,892.09
Court Costs – Filing Fees	\$4,530.00
Federal Express/Overnight Delivery	\$72.20
Photocopies – In House	\$469.60
Photocopies – Outside	\$5,504.60
Air Travel	\$583.22
Meals	\$18.43

Deposition Costs	\$82.58
Service of Process Fees	\$100.50
Telephone / Fax	\$374.34
Experts / Consultant Fees	\$33,330.40
Mediation Expenses	\$39,333.59
Electronic Database Charges	\$8,820
Other Charges	\$808.66
Total	\$115,920.21

TIME AND EFFORT BY PLAINTIFFS

79. In addition to the time and expenses Class Counsel incurred in this action, the Class Representatives have spent considerable time and effort in their pursuit of this litigation and in seeking to advance the legal rights and interests of the Class, including time spent in fact-finding interviews with Plaintiffs' counsel for the CAC, discussing this litigation with Plaintiffs' counsel, and communicating with Class Counsel about the proposed settlement. Class Representatives also participated in discovery by submitting information, declarations, and other evidence, including electronic devices for forensic imaging, as requested by Class Counsel.

80. Attached as Exhibit E are true and correct copies of declarations from each of the eleven Class Representatives.

* * *

81. For the foregoing reasons, and those set forth in Plaintiffs' Motion for Attorneys' Fees, Expenses, and Plaintiff Service Awards, Plaintiffs respectfully request that the Court award Class Counsel \$14,500,000 in fees and \$115,920.21 in expenses pursuant to Federal Rule of Civil Procedure 23(h), to be allocated by Co-Lead Class Counsel among HK, LCHB, BC, and additional counsel that performed work inuring to the benefit of the Class, and Plaintiff Service Awards in the total amount of \$55,000.

1 I declare under penalty of perjury that the foregoing is true and correct as to all matters of
2 which I have personal knowledge. Executed this 28th day of January, 2022, in Rancho Santa
3 Margarita, California.

4
5 /s/ Shawn Kennedy

Shawn M. Kennedy

6
7 I declare under penalty of perjury that the foregoing is true and correct as to all matters of
8 which I have personal knowledge. Executed this 28th day of January, 2022, in New York, New
9 York.

10
11 /s/ Rachel Geman

Rachel Geman

12
13 I declare under penalty of perjury that the foregoing is true and correct as to all matters of
14 which I have personal knowledge. Executed this 28th day of January, 2022, in Washington, D.C.

15
16 /s/ Christopher Cormier

Christopher J. Cormier

EXHIBIT A

In re Plaid Inc. Privacy Litigation
CATEGORY TIME REPORT

HERRERA KENNEDY LLP

Reporting Period: Inception - January 25, 2022

Hours By Category

Timekeeper	Lead Counsel Calls / Meetings	Investigations / Factual Research	Discovery (Draft / Respond / Meet & Confer)	Discovery (Document Review)	Pleadings, Briefs, Motions	Court Appearances & Preparation	Settlement	Case Management & Litigation Strategy	Legal Research	Experts / Consultants	TOTALS
Shawn Kennedy	98.30	153.50	96.20	12.00	477.10	79.40	130.20	40.70	186.90	11.40	1,285.70
Bret Hembd	69.30	23.90	17.10		81.30	2.50	39.40	19.70	37.70	9.90	300.80
Nicomedes Herrera	69.80	34.40	18.80		40.50	3.60	43.20	22.30	8.60	16.40	257.60
Andrew Purdy	19.70	9.90			21.60			3.60	4.00	0.70	59.50
Laura Seidl	18.10				4.60	4.90	13.00		0.70		41.30
TOTALS	275.20	221.70	132.10	12.00	625.10	90.40	225.80	86.30	237.90	38.40	1,944.90

Lodestar By Category

Timekeeper	Lead Counsel Calls / Meetings	Investigations / Factual Research	Discovery (Draft / Respond / Meet & Confer)	Discovery (Document Review)	Pleadings, Briefs, Motions	Court Appearances & Preparation	Settlement	Case Management & Litigation Strategy	Legal Research	Experts / Consultants	TOTALS
Shawn Kennedy (\$950/hour)	\$ 93,385.00	\$ 145,825.00	\$ 91,390.00	\$ 11,400.00	\$ 453,245.00	\$ 75,430.00	\$ 123,690.00	\$ 38,665.00	\$ 177,555.00	\$ 10,830.00	\$ 1,221,415.00
Bret Hembd (\$825/hour)	\$ 57,172.50	\$ 19,717.50	\$ 14,107.50	\$ -	\$ 67,072.50	\$ 2,062.50	\$ 32,505.00	\$ 16,252.50	\$ 31,102.50	\$ 8,167.50	\$ 248,160.00
Nicomedes Herrera (\$975/hour)	\$ 68,055.00	\$ 33,540.00	\$ 18,330.00	\$ -	\$ 39,487.50	\$ 3,510.00	\$ 42,120.00	\$ 21,742.50	\$ 8,385.00	\$ 15,990.00	\$ 251,160.00
Andrew Purdy (\$950/hour)	\$ 18,715.00	\$ 9,405.00	\$ -	\$ -	\$ 20,520.00	\$ -	\$ -	\$ 3,420.00	\$ 3,800.00	\$ 665.00	\$ 56,525.00
Laura Seidl (\$825/hour)	\$ 14,932.50	\$ -	\$ -	\$ -	\$ 3,795.00	\$ 4,042.50	\$ 10,725.00	\$ -	\$ 577.50	\$ -	\$ 34,072.50
TOTALS	\$ 252,260.00	\$ 208,487.50	\$ 123,827.50	\$ 11,400.00	\$ 584,120.00	\$ 85,045.00	\$ 209,040.00	\$ 80,080.00	\$ 221,420.00	\$ 35,652.50	\$ 1,811,332.50

EXHIBIT B

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

4089-0001

PLAID FINANCIAL PRIVACY - General Matter

TASK CODES From Inception to 01-25-22

											TOTALS				
Name	1	2	3	4	6	7	8	12	13	14	Cur. Hrs	Cum. Hrs	Rate	Cur. Lod	Cum. Lod
MICHAEL SOBOL	1.30	3.40	1.90	0	10.50	3.40	13.80	13.90	0.50	6.40	55.10	55.10	1,025.00	56,477.50	56,477.50
ARIANA DELUCCHI	0	32.60	0.70	0	24.90	1.00	12.30	69.10	0	0.50	141.10	141.10	395.00	55,734.50	55,734.50
DANNA ELMASRY	0	0	0	0	7.40	0	12.00	2.40	6.80	0	28.60	28.60	370.00	10,582.00	10,582.00
MELISSA GARDNER	31.00	45.00	137.00	5.20	228.10	64.20	184.10	90.50	53.80	22.50	861.40	861.40	610.00	525,454.00	525,454.00
RACHEL GEMAN	37.90	22.40	21.00	6.20	91.50	60.20	175.50	35.20	6.50	10.00	466.40	466.40	850.00	396,440.00	396,440.00
RHEA GHOSH	3.20	0.70	65.40	4.20	126.50	17.00	105.40	13.70	9.00	5.50	350.60	350.60	465.00	163,029.00	163,029.00
MADELINE GOMEZ	12.70	15.10	0	0	38.30	0	0	9.30	18.90	2.70	97.00	97.00	465.00	45,105.00	45,105.00
NICHOLAS HARTMANN	0.80	0	0	0	15.00	9.20	20.70	0	0	0	45.70	45.70	535.00	24,449.50	24,449.50
MIKE SHEEN	0	0	0	0	26.90	0	2.10	5.90	0	0	34.90	34.90	555.00	19,369.50	19,369.50
TOTALS HOURS:	86.90	119.20	226.00	15.60	569.10	155.00	525.90	240.00	95.50	47.60	2,080.80	2,080.80		\$1,296,641.00	\$1,296,641.00
TOTAL LODESTAR	\$60,279.00	\$70,199.00	\$134,055.00	\$10,395.00	\$339,838.50	\$107,039.00	\$346,170.50	\$141,524.50	\$54,345.00	\$32,795.50				\$1,296,641.00	\$ 1,236,362.00

Task Code	Description
1	Lead Counsel Calls/Meetings
10	Trial Preparation
11	Trial
12	Case Management & Litigation Strategy
13	Legal Research
14	Experts/Consultants
15	Appeal
2	Investigations/Factual Research
3	Discovery (Draft/Respond/Meet & Confer)
4	Discovery (Document Review)
5	Discovery (Depositions)
6	Pleadings, Briefs, Motions
7	Court Appearances & Preparation
8	Settlement
9	Class Certification

EXHIBIT C

In re Plaid Inc. Privacy Litigation
CATEGORY TIME REPORT

Burns Charest LLP

Reporting Period: Inception - January 25, 2022

Timekeeper	Lead Counsel Calls / Meetings	Investigations / Factual Research	Discovery (Draft / Respond / Meet & Confer)	Discovery (Document Review)	Pleadings, Briefs, Motions	Court Appearances & Preparation	Settlement	Case Management & Litigation Strategy	Legal Research	Experts / Consultants	TOTALS
Warren Burns	0.00	0.00	0.00	0.00	0.00	0.00	0.00	49.50	0.00	0.00	49.50
Chris Cormier	10.20	118.20	175.90	11.20	59.20	51.90	300.40	166.00	81.40	0.00	974.40
Jacob Gower	1.90	2.10	7.20	0.00	34.30	0.00	0.00	7.20	0.00	0.00	52.70
Russ Herman	1.00	0.00	128.00	0.00	38.90	0.50	0.00	51.10	8.00	0.00	227.50
Brittney Johnson	15.60	1.50	31.20	0.00	0.00	0.00	3.00	117.50	0.00	0.00	168.80
Mark Anderson	0.00	0.00	0.80	0.00	1.80	0.00	0.00	87.30	10.40	0.00	100.30
Andrew Bynum	0.00	0.00	12.70	0.30	0.00	0.00	0.00	0.20	0.00	0.00	13.20
Julianna Gravois	0.00	0.00	0.50	0.00	1.80	0.00	0.00	12.10	0.00	0.00	14.40
TOTAL	28.70	121.80	356.30	11.50	136.00	52.40	303.40	490.90	99.80	0.00	1,600.80

In re Plaid Inc. Privacy Litigation
CATEGORY LODESTAR REPORT

Burns Charest LLP

Reporting Period: Inception - January 25, 2022

Timekeeper	Rate	Lead Counsel Calls / Meetings	Investigations / Factual Research	Discovery (Draft / Respond / Meet & Confer)	Discovery (Document Review)	Pleadings, Briefs, Motions	Court Appearances & Preparation	Settlement	Case Management & Litigation Strategy	Legal Research	Experts / Consultants	TOTALS
Warren Burns	\$1,050.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$51,975.00	\$0.00	\$0.00	\$51,975.00
Chris Cormier	\$950.00	\$9,690.00	\$112,290.00	\$167,105.00	\$10,640.00	\$56,240.00	\$49,305.00	\$285,380.00	\$157,700.00	\$77,330.00	\$0.00	\$925,680.00
Jacob Gower	\$500.00	\$950.00	\$1,050.00	\$3,600.00	\$0.00	\$17,150.00	\$0.00	\$0.00	\$3,600.00	\$0.00	\$0.00	\$26,350.00
Russ Herman	\$600.00	\$600.00	\$0.00	\$76,800.00	\$0.00	\$23,340.00	\$300.00	\$0.00	\$30,660.00	\$4,800.00	\$0.00	\$136,500.00
Brittney Johnson	\$550.00	\$8,580.00	\$825.00	\$17,160.00	\$0.00	\$0.00	\$0.00	\$1,650.00	\$64,625.00	\$0.00	\$0.00	\$92,840.00
Mark Anderson	\$425.00	\$0.00	\$0.00	\$340.00	\$0.00	\$765.00	\$0.00	\$0.00	\$37,102.50	\$4,420.00	\$0.00	\$42,627.50
Andrew Bynum	\$425.00	\$0.00	\$0.00	\$5,397.50	\$127.50	\$0.00	\$0.00	\$0.00	\$85.00	\$0.00	\$0.00	\$5,610.00
Juliana Gravois	\$325.00	\$0.00	\$0.00	\$162.50	\$0.00	\$585.00	\$0.00	\$0.00	\$3,932.50	\$0.00	\$0.00	\$4,680.00
TOTAL		\$19,820.00	\$114,165.00	\$270,565.00	\$10,767.50	\$98,080.00	\$49,605.00	\$287,030.00	\$349,680.00	\$86,550.00	\$0.00	\$1,286,262.50

EXHIBIT D

In re Plaid Inc. Privacy Litigation
ALL FIRM EXPENSE REPORT

Firm Name: ALL FIRMS

Reporting Period: Inception - January 25, 2022

Disbursement	Burns Charest	Herrera Kennedy	Lieff Cabrer	Nussbaum Law	Reinhardt Wendorf	Robins Kaplan	Spector Roseman	Tostrud Law	Glancy Prongay	Criden Love PA	Hartley	Cumulative Totals
Electronic Research (Lexis/Westlaw/PACER)	\$160.60	\$14,612.41	\$5,312.12	\$303.02	\$7.70	\$300.19	\$796.35	\$310.00	\$79.50	\$10.20		\$21,892.09
Court Costs - Filing Fees		\$400.00	\$620.00	\$310.00	\$310.00	\$710.00	\$1,240.00		\$320.00	\$620.00		\$4,530.00
Federal Express/Overnight Delivery/Messengers		\$40.00	\$32.20									\$72.20
Photocopies - In House			\$323.80	\$17.55				\$128.25				\$469.60
Photocopies - Outside			\$5,504.60									\$5,504.60
Air Travel								\$583.22				\$583.22
Meals	\$18.43											\$18.43
Deposition Costs			\$82.58									\$82.58
Service of Process Fees			\$100.50									\$100.50
Telephone / Fax			\$253.34					\$121.00				\$374.34
Experts/Consultant Fees	\$12,913.90	\$8,166.60	\$12,249.90									\$33,330.40
Mediation Expenses	\$14,750.10	\$9,833.39	\$14,750.10									\$39,333.59
Misc. (Describe) Electronic Database			\$8,820.00									\$8,820.00
Misc. (Describe) Other Charges			\$808.66									\$808.66
TOTAL	\$27,843.03	\$33,052.40	\$48,857.80	\$630.57	\$317.70	\$1,010.19	\$2,036.35	\$1,142.47	\$399.50	\$630.20	\$0.00	\$115,920.21

EXHIBIT E

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY
LITIGATION

Master Docket No.: 4:20-cv-03056-DMR

**DECLARATION OF CAROLINE
ANDERSON IN SUPPORT OF FINAL
APPROVAL OF SETTLEMENT**

THIS DOCUMENT RELATES TO:
ALL ACTIONS

1 I, Caroline Anderson, declare as follows:

2 1. I am one of the class representatives appointed in this case.

3 2. I submit this declaration in support of final approval of the settlement. I have
4 personal knowledge of the facts stated herein. If called to testify to the contents of this
5 declaration, I could and would competently do so.

6 3. I voluntarily undertook the burdens and risks associated with this lawsuit to try to
7 stop Defendant's unauthorized collection and use of my private financial information as well as
8 that of other class members.

9 4. I have participated actively in this lawsuit. I have followed the status and progress
10 of the case and met in person with counsel on multiple occasions or communicated by phone and
11 email to stay informed, including during the mediations and settlement negotiations. I will
12 continue to do so during this settlement approval process, as needed. In addition, I have also:

- 13 • helped counsel draft the amended complaint by describing to them my story and
14 relevant facts and events. As part of that process, I reviewed and provided
15 documents and information, including from my mobile device, applications I use,
16 and my financial account(s).
 - 17 • reviewed and discussed with my counsel numerous other documents related to this
18 case, including this Court's motion to dismiss order, discovery request responses,
19 the preliminary approval briefing, and the settlement.
 - 20 • searched for and provided to counsel and preserved any documents that were
21 pertinent to the case, understanding that Defendant would receive copies of
22 documents to which they were entitled, possibly even private documents,
23 including some related to my mobile device, applications I use, and my financial
24 account(s).
 - 25 • gathered and provided information relevant to the case needed to respond to
26 numerous interrogatories served by Defendant, and reviewed the responses to
27 those interrogatories for accuracy.
- 28

- provided my counsel with my mobile device, which contains highly sensitive and important personal information. I agreed to allow my device to be forensically imaged, and for certain data to be extracted and provided to Defendant, in order to support my claims and this litigation generally.

5. I believe that the injunctive and monetary relief provided by the settlement, which is described in detail in the settlement agreement, offers a fair resolution of my claims against Defendant, and that implementing these changes now is preferable to continuing this litigation for a lengthy amount of time and an uncertain and possibly negative outcome. As reflected in Plaintiffs' motion for final approval, counsel is available to address all questions about the settlement, including allocation of settlement funds.

6. I have never been promised any compensation for performing my duties as a plaintiff and class representative, including any service award, and am aware of no interest of mine in this litigation that conflicts with the interests of other class members. I understand, however, that Class Counsel intends to request that the Court award me \$5,000 for my time and efforts on behalf of the settlement class.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of January, 2022, in Dunbarton, New Hampshire.

By: 

Caroline Anderson

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY
LITIGATION

Master Docket No.: 4:20-cv-03056-DMR

**DECLARATION OF JAMES COTTLE IN
SUPPORT OF FINAL APPROVAL OF
SETTLEMENT**

THIS DOCUMENT RELATES TO:
ALL ACTIONS

1 I, James Cottle, declare as follows:

2 1. I am one of the class representatives appointed in this case.

3 2. I submit this declaration in support of final approval of the settlement. I have
4 personal knowledge of the facts stated herein. If called to testify to the contents of this
5 declaration, I could and would competently do so.

6 3. I voluntarily undertook the burdens and risks associated with this lawsuit to try to
7 stop Defendant's unauthorized collection and use of my private financial information as well as
8 that of other class members.

9 4. I have participated actively in this lawsuit. I have followed the status and progress
10 of the case and met in person with counsel on multiple occasions or communicated by phone and
11 email to stay informed, including during the mediations and settlement negotiations. I will
12 continue to do so during this settlement approval process, as needed. In addition, I have also:

- 13 • helped counsel draft the amended complaint by describing to them my story and
14 relevant facts and events. As part of that process, I reviewed and provided
15 documents and information, including from my mobile device, applications I use,
16 and my financial account(s).
 - 17 • reviewed and discussed with my counsel numerous other documents related to this
18 case, including this Court's motion to dismiss order, discovery request responses,
19 the preliminary approval briefing, and the settlement.
 - 20 • searched for and provided to counsel and preserved any documents that were
21 pertinent to the case, understanding that Defendant would receive copies of
22 documents to which they were entitled, possibly even private documents,
23 including some related to my mobile device, applications I use, and my financial
24 account(s).
 - 25 • gathered and provided information relevant to the case needed to respond to
26 numerous interrogatories served by Defendant, and reviewed the responses to
27 those interrogatories for accuracy.
- 28

- provided my counsel with my mobile device, which contains highly sensitive and important personal information. I agreed to allow my device to be forensically imaged, and for certain data to be extracted and provided to Defendant, in order to support my claims and this litigation generally.

5. I believe that the injunctive and monetary relief provided by the settlement, which is described in detail in the settlement agreement, offers a fair resolution of my claims against Defendant, and that implementing these changes now is preferable to continuing this litigation for a lengthy amount of time and an uncertain and possibly negative outcome. As reflected in Plaintiffs' motion for final approval, counsel is available to address all questions about the settlement, including allocation of settlement funds.

6. I have never been promised any compensation for performing my duties as a plaintiff and class representative, including any service award, and am aware of no interest of mine in this litigation that conflicts with the interests of other class members. I understand, however, that Class Counsel intends to request that the Court award me \$5,000 for my time and efforts on behalf of the settlement class.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 21st day of January, 2022, in San Anselmo, California.

By: James Cottle
James Cottle 1/21/2022

Certificate Of Completion

Envelope Id: 43A39987415347E9A395D65F425DDC6A

Status: Completed

Subject: Please DocuSign: Plaid - Class Representative Declaration ISO Final Approval of Settlement (COT...

Source Envelope:

Document Pages: 3

Signatures: 1

Envelope Originator:

Certificate Pages: 1

Initials: 0

James Cottle

AutoNav: Enabled

181 3rd St #225

Enveloped Stamping: Enabled

San Rafael, CA 94901

Time Zone: (UTC-08:00) Pacific Time (US & Canada)

james@holmesburrell.com

IP Address: 76.126.107.247

Record Tracking

Status: Original

Holder: James Cottle

Location: DocuSign

1/21/2022 11:26:02 AM

james@holmesburrell.com

Signer Events**Signature****Timestamp**

James Cottle

James Cottle

Sent: 1/21/2022 11:27:19 AM

james@holmesburrell.com

Viewed: 1/21/2022 11:27:29 AM

Holmes Burrell Real Estate

Signed: 1/21/2022 11:27:34 AM

Holmes Burrell Real Estate

Security Level: Email, Account Authentication
(None)Signature Adoption: Pre-selected Style
Using IP Address: 76.126.107.247**Electronic Record and Signature Disclosure:**

Not Offered via DocuSign

In Person Signer Events**Signature****Timestamp****Editor Delivery Events****Status****Timestamp****Agent Delivery Events****Status****Timestamp****Intermediary Delivery Events****Status****Timestamp****Certified Delivery Events****Status****Timestamp****Carbon Copy Events****Status****Timestamp****Witness Events****Signature****Timestamp****Notary Events****Signature****Timestamp****Envelope Summary Events****Status****Timestamps**

Envelope Sent

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Security Checked

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Payment Events**Status****Timestamps**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY
LITIGATION

Master Docket No.: 4:20-cv-03056-DMR

**DECLARATION OF RACHEL CURTIS IN
SUPPORT OF FINAL APPROVAL OF
SETTLEMENT**

THIS DOCUMENT RELATES TO:
ALL ACTIONS

1 I, RACHEL CURTIS declare as follows:

2 1. I am one of the class representatives appointed in this case.

3 2. I submit this declaration in support of final approval of the settlement. I have
4 personal knowledge of the facts stated herein. If called to testify to the contents of this
5 declaration, I could and would competently do so.

6 3. I voluntarily undertook the burdens and risks associated with this lawsuit to try to
7 stop Defendant's unauthorized collection and use of my private financial information as well as
8 that of other class members.

9 4. I have participated actively in this lawsuit. I have followed the status and progress
10 of the case and met in person with counsel on multiple occasions or communicated by phone and
11 email to stay informed, including during the mediations and settlement negotiations. I will
12 continue to do so during this settlement approval process, as needed. In addition, I have also:

- 13 • helped counsel draft the amended complaint by describing to them my story and
14 relevant facts and events. As part of that process, I reviewed and provided
15 documents and information, including from my mobile device, applications I use,
16 and my financial account(s).
 - 17 • reviewed and discussed with my counsel numerous other documents related to this
18 case, including this Court's motion to dismiss order, discovery request responses,
19 the preliminary approval briefing, and the settlement.
 - 20 • searched for and provided to counsel and preserved any documents that were
21 pertinent to the case, understanding that Defendant would receive copies of
22 documents to which they were entitled, possibly even private documents,
23 including some related to my mobile device, applications I use, and my financial
24 account(s).
 - 25 • gathered and provided information relevant to the case needed to respond to
26 numerous interrogatories served by Defendant, and reviewed the responses to
27 those interrogatories for accuracy.
- 28

- provided my counsel with my mobile device, which contains highly sensitive and important personal information. I agreed to allow my device to be forensically imaged, and for certain data to be extracted and provided to Defendant, in order to support my claims and this litigation generally.

5. I believe that the injunctive and monetary relief provided by the settlement, which is described in detail in the settlement agreement, offers a fair resolution of my claims against Defendant, and that implementing these changes now is preferable to continuing this litigation for a lengthy amount of time and an uncertain and possibly negative outcome. As reflected in Plaintiffs' motion for final approval, counsel is available to address all questions about the settlement, including allocation of settlement funds.

6. I have never been promised any compensation for performing my duties as a plaintiff and class representative, including any service award, and am aware of no interest of mine in this litigation that conflicts with the interests of other class members. I understand, however, that Class Counsel intends to request that the Court award me \$5,000 for my time and efforts on behalf of the settlement class.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10 day of January, 2022, in Miami Dade, Florida.

By: _____

RACHEL CURTIS

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY
LITIGATION

Master Docket No.: 4:20-cv-03056-DMR

**DECLARATION OF DAVID EVANS IN
SUPPORT OF FINAL APPROVAL OF
SETTLEMENT**

THIS DOCUMENT RELATES TO:
ALL ACTIONS

1 I, DAVID EVANS, declare as follows:

2 1. I am one of the class representatives appointed in this case.

3 2. I submit this declaration in support of final approval of the settlement. I have
4 personal knowledge of the facts stated herein. If called to testify to the contents of this
5 declaration, I could and would competently do so.

6 3. I voluntarily undertook the burdens and risks associated with this lawsuit to try to
7 stop Defendant's unauthorized collection and use of my private financial information as well as
8 that of other class members.

9 4. I have participated actively in this lawsuit. I have followed the status and progress
10 of the case and met in person with counsel on multiple occasions or communicated by phone and
11 email to stay informed, including during the mediations and settlement negotiations. I will
12 continue to do so during this settlement approval process, as needed. In addition, I have also:

- 13 • helped counsel draft the amended complaint by describing to them my story and
14 relevant facts and events. As part of that process, I reviewed and provided
15 documents and information, including from my mobile device, applications I use,
16 and my financial account(s).
 - 17 • reviewed and discussed with my counsel numerous other documents related to this
18 case, including this Court's motion to dismiss order, discovery request responses,
19 the preliminary approval briefing, and the settlement.
 - 20 • searched for and provided to counsel and preserved any documents that were
21 pertinent to the case, understanding that Defendant would receive copies of
22 documents to which they were entitled, possibly even private documents,
23 including some related to my mobile device, applications I use, and my financial
24 account(s).
 - 25 • gathered and provided information relevant to the case needed to respond to
26 numerous interrogatories served by Defendant, and reviewed the responses to
27 those interrogatories for accuracy.
- 28

- offered to provide my counsel with my mobile device, which contains highly sensitive and important personal information. I agreed to allow my device to be forensically imaged, and for certain data to be extracted and provided to Defendant, in order to support my claims and this litigation generally.

5. I believe that the injunctive and monetary relief provided by the settlement, which is described in detail in the settlement agreement, offers a fair resolution of my claims against Defendant, and that implementing these changes now is preferable to continuing this litigation for a lengthy amount of time and an uncertain and possibly negative outcome. As reflected in Plaintiffs' motion for final approval, counsel is available to address all questions about the settlement, including allocation of settlement funds.

6. I have never been promised any compensation for performing my duties as a plaintiff and class representative, including any service award, and am aware of no interest of mine in this litigation that conflicts with the interests of other class members. I understand, however, that Class Counsel intends to request that the Court award me \$5,000 for my time and efforts on behalf of the settlement class.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of January, 2022, in Monrovia, CA.

By: 

David Evans

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY
LITIGATION

Master Docket No.: 4:20-cv-03056-DMR

**DECLARATION OF LOGAN MITCHELL
IN SUPPORT OF FINAL APPROVAL OF
SETTLEMENT**

THIS DOCUMENT RELATES TO:
ALL ACTIONS

1 I, Logan Mitchell declare as follows:

2 1. I am one of the class representatives appointed in this case.

3 2. I submit this declaration in support of final approval of the settlement. I have
4 personal knowledge of the facts stated herein. If called to testify to the contents of this
5 declaration, I could and would competently do so.

6 3. I voluntarily undertook the burdens and risks associated with this lawsuit to try to
7 stop Defendant's unauthorized collection and use of my private financial information as well as
8 that of other class members.

9 4. I have participated actively in this lawsuit. I have followed the status and progress
10 of the case and met with counsel on multiple occasions or communicated by phone and email to
11 stay informed, including during the mediations and settlement negotiations. I will continue to do
12 so during this settlement approval process, as needed. In addition, I have also:

- 13 • helped counsel draft the amended complaint by describing to them my story and
14 relevant facts and events. As part of that process, I reviewed and provided
15 documents and information, including from my mobile device, applications I use,
16 and my financial account(s).
- 17 • reviewed and discussed with my counsel numerous other documents related to this
18 case, including this Court's motion to dismiss order, discovery request responses,
19 the preliminary approval briefing, and the settlement.
- 20 • searched for and provided to counsel and preserved any documents that were
21 pertinent to the case, understanding that Defendant would receive copies of
22 documents to which they were entitled, possibly even private documents,
23 including some related to my mobile device, applications I use, and my financial
24 account(s).
- 25 • gathered and provided information relevant to the case needed to respond to
26 numerous interrogatories served by Defendant, and reviewed the responses to
27 those interrogatories for accuracy.
- 28

- provided my counsel with my mobile device, which contains highly sensitive and important personal information. I agreed to allow my device to be forensically imaged, and for certain data to be extracted and provided to Defendant, in order to support my claims and this litigation generally.

5. I believe that the injunctive and monetary relief provided by the settlement, which is described in detail in the settlement agreement, offers a fair resolution of my claims against Defendant, and that implementing these changes now is preferable to continuing this litigation for a lengthy amount of time and an uncertain and possibly negative outcome. As reflected in Plaintiffs' motion for final approval, counsel is available to address all questions about the settlement, including allocation of settlement funds.

6. I have never been promised any compensation for performing my duties as a plaintiff and class representative, including any service award, and am aware of no interest of mine in this litigation that conflicts with the interests of other class members. I understand, however, that Class Counsel intends to request that the Court award me \$5,000 for my time and efforts on behalf of the settlement class.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of January, 2022, in San Diego, California.

DocuSigned by:

By: E36B78192D65467...
Logan Mitchell

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY
LITIGATION

Master Docket No.: 4:20-cv-03056-DMR

**DECLARATION OF ALEXIS MULLEN IN
SUPPORT OF FINAL APPROVAL OF
SETTLEMENT**

THIS DOCUMENT RELATES TO:
ALL ACTIONS

1 I, ALEXIS MULLEN declare as follows:

2 1. I am one of the class representatives appointed in this case.

3 2. I submit this declaration in support of final approval of the settlement. I have
4 personal knowledge of the facts stated herein. If called to testify to the contents of this
5 declaration, I could and would competently do so.

6 3. I voluntarily undertook the burdens and risks associated with this lawsuit to try to
7 stop Defendant's unauthorized collection and use of my private financial information as well as
8 that of other class members.

9 4. I have participated actively in this lawsuit. I have followed the status and progress
10 of the case and met in person with counsel on multiple occasions or communicated by phone and
11 email to stay informed, including during the mediations and settlement negotiations. I will
12 continue to do so during this settlement approval process, as needed. In addition, I have also:

- 13 • helped counsel draft the amended complaint by describing to them my story and
14 relevant facts and events. As part of that process, I reviewed and provided
15 documents and information, including from my mobile device, applications I use,
16 and my financial account(s).
 - 17 • reviewed and discussed with my counsel numerous other documents related to this
18 case, including this Court's motion to dismiss order, discovery request responses,
19 the preliminary approval briefing, and the settlement.
 - 20 • searched for and provided to counsel and preserved any documents that were
21 pertinent to the case, understanding that Defendant would receive copies of
22 documents to which they were entitled, possibly even private documents,
23 including some related to my mobile device, applications I use, and my financial
24 account(s).
 - 25 • gathered and provided information relevant to the case needed to respond to
26 numerous interrogatories served by Defendant, and reviewed the responses to
27 those interrogatories for accuracy.
- 28

- provided my counsel with my mobile device, which contains highly sensitive and important personal information. I agreed to allow my device to be forensically imaged, and for certain data to be extracted and provided to Defendant, in order to support my claims and this litigation generally.

5. I believe that the injunctive and monetary relief provided by the settlement, which is described in detail in the settlement agreement, offers a fair resolution of my claims against Defendant, and that implementing these changes now is preferable to continuing this litigation for a lengthy amount of time and an uncertain and possibly negative outcome. As reflected in Plaintiffs' motion for final approval, counsel is available to address all questions about the settlement, including allocation of settlement funds.

6. I have never been promised any compensation for performing my duties as a plaintiff and class representative, including any service award, and am aware of no interest of mine in this litigation that conflicts with the interests of other class members. I understand, however, that Class Counsel intends to request that the Court award me \$5,000 for my time and efforts on behalf of the settlement class.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10 day of January, 2022, in Philadelphia, PA.

By: Alexis Mullen
ALEXIS MULLEN

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY
LITIGATION

Master Docket No.: 4:20-cv-03056-DMR

**DECLARATION OF JORDAN SACKS IN
SUPPORT OF FINAL APPROVAL OF
SETTLEMENT**

THIS DOCUMENT RELATES TO:
ALL ACTIONS

1 I, JORDAN SACKS declare as follows:

2 1. I am one of the class representatives appointed in this case.

3 2. I submit this declaration in support of final approval of the settlement. I have
4 personal knowledge of the facts stated herein. If called to testify to the contents of this
5 declaration, I could and would competently do so.

6 3. I voluntarily undertook the burdens and risks associated with this lawsuit to try to
7 stop Defendant's unauthorized collection and use of my private financial information as well as
8 that of other class members.

9 4. I have participated actively in this lawsuit. I have followed the status and progress
10 of the case and met in person with counsel on multiple occasions or communicated by phone and
11 email to stay informed, including during the mediations and settlement negotiations. I will
12 continue to do so during this settlement approval process, as needed. In addition, I have also:

- 13 • helped counsel draft the amended complaint by describing to them my story and
14 relevant facts and events. As part of that process, I reviewed and provided
15 documents and information, including from my mobile device, applications I use,
16 and my financial account(s).
- 17 • reviewed and discussed with my counsel numerous other documents related to this
18 case, including this Court's motion to dismiss order, discovery request responses,
19 the preliminary approval briefing, and the settlement.
- 20 • searched for and provided to counsel and preserved any documents that were
21 pertinent to the case, understanding that Defendant would receive copies of
22 documents to which they were entitled, possibly even private documents,
23 including some related to my mobile device, applications I use, and my financial
24 account(s).
- 25 • gathered and provided information relevant to the case needed to respond to
26 numerous interrogatories served by Defendant, and reviewed the responses to
27 those interrogatories for accuracy.
- 28

- provided my counsel with my mobile device, which contains highly sensitive and important personal information. I agreed to allow my device to be forensically imaged, and for certain data to be extracted and provided to Defendant, in order to support my claims and this litigation generally.

5. I believe that the injunctive and monetary relief provided by the settlement, which is described in detail in the settlement agreement, offers a fair resolution of my claims against Defendant, and that implementing these changes now is preferable to continuing this litigation for a lengthy amount of time and an uncertain and possibly negative outcome. As reflected in Plaintiffs' motion for final approval, counsel is available to address all questions about the settlement, including allocation of settlement funds.

6. I have never been promised any compensation for performing my duties as a plaintiff and class representative, including any service award, and am aware of no interest of mine in this litigation that conflicts with the interests of other class members. I understand, however, that Class Counsel intends to request that the Court award me \$5,000 for my time and efforts on behalf of the settlement class.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 11 day of January, 2022, in Arlington, VA.

By: 
JORDAN SACKS

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY
LITIGATION

Master Docket No.: 4:20-cv-03056-DMR

**DECLARATION OF FREDERICK
SCHOENEMAN IN SUPPORT OF FINAL
APPROVAL OF SETTLEMENT**

THIS DOCUMENT RELATES TO:
ALL ACTIONS

1 I, Frederick Schoeneman, declare as follows:

2 1. I am one of the class representatives appointed in this case.

3 2. I submit this declaration in support of final approval of the settlement. I have
4 personal knowledge of the facts stated herein. If called to testify to the contents of this
5 declaration, I could and would competently do so.

6 3. I voluntarily undertook the burdens and risks associated with this lawsuit to try to
7 stop Defendant's unauthorized collection and use of my private financial information as well as
8 that of other class members.

9 4. I have participated actively in this lawsuit. I have followed the status and progress
10 of the case and met in person with counsel on multiple occasions or communicated by phone and
11 email to stay informed, including during the mediations and settlement negotiations. I will
12 continue to do so during this settlement approval process, as needed. In addition, I have also:

- 13 • helped counsel draft the amended complaint by describing to them my story and
14 relevant facts and events. As part of that process, I reviewed and provided
15 documents and information, including from my mobile device, applications I use,
16 and my financial account(s).
 - 17 • reviewed and discussed with my counsel numerous other documents related to this
18 case, including this Court's motion to dismiss order, discovery request responses,
19 the preliminary approval briefing, and the settlement.
 - 20 • searched for and provided to counsel and preserved any documents that were
21 pertinent to the case, understanding that Defendant would receive copies of
22 documents to which they were entitled, possibly even private documents,
23 including some related to my mobile device, applications I use, and my financial
24 account(s).
 - 25 • gathered and provided information relevant to the case needed to respond to
26 numerous interrogatories served by Defendant, and reviewed the responses to
27 those interrogatories for accuracy.
- 28

- provided my counsel with my mobile device, which contains highly sensitive and important personal information. I agreed to allow my device to be forensically imaged, and for certain data to be extracted and provided to Defendant, in order to support my claims and this litigation generally.

5. I believe that the injunctive and monetary relief provided by the settlement, which is described in detail in the settlement agreement, offers a fair resolution of my claims against Defendant, and that implementing these changes now is preferable to continuing this litigation for a lengthy amount of time and an uncertain and possibly negative outcome. As reflected in Plaintiffs' motion for final approval, counsel is available to address all questions about the settlement, including allocation of settlement funds.

6. I have never been promised any compensation for performing my duties as a plaintiff and class representative, including any service award, and am aware of no interest of mine in this litigation that conflicts with the interests of other class members. I understand, however, that Class Counsel intends to request that the Court award me \$5,000 for my time and efforts on behalf of the settlement class.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 2st day of January, 2022, in _____, _____.

DocuSigned by:
Frederick Schoeneman
By: _____
FREDERICK SCHOENEMAN

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY
LITIGATION

Master Docket No.: 4:20-cv-03056-DMR

**DECLARATION OF GABRIEL SOTELO
IN SUPPORT OF COURT APPROVAL OF
THE SETTLEMENT**

THIS DOCUMENT RELATES TO:
ALL ACTIONS

1 I, Gabriel Sotelo declare as follows:

2 1. I am one of the class representatives appointed in this case.

3 2. I submit this declaration in support of Court approval of the settlement. I have
4 personal knowledge of the facts stated herein. If called to testify to the contents of this
5 declaration, I could and would competently do so.

6 3. I voluntarily undertook the burdens and risks associated with this lawsuit to try to
7 stop Defendant's unauthorized collection and use of my private financial information as well as
8 that of other class members.

9 4. I have participated actively in this lawsuit. I have followed the status and progress
10 of the case and met in person with counsel on multiple occasions or communicated by phone and
11 email to stay informed, including during the mediations and settlement negotiations. I will
12 continue to do so during this settlement approval process, as needed. In addition, I have also:

- 13 • helped counsel draft the amended complaint by describing to them my story and
14 relevant facts and events. As part of that process, I reviewed and provided
15 documents and information, including from my mobile device, applications I use,
16 and my financial account(s).
 - 17 • reviewed or discussed with my counsel numerous other documents related to this
18 case, including this Court's motion to dismiss order, discovery request responses,
19 the preliminary approval briefing, and the settlement.
 - 20 • searched for and provided to counsel or preserved any documents that were
21 pertinent to the case, understanding that Defendant would receive copies of
22 documents to which they were entitled, possibly even private documents,
23 including some related to my mobile device, applications I use, or my financial
24 account(s).
 - 25 • gathered and provided information relevant to the case needed to respond to
26 numerous interrogatories served by Defendant, and reviewed the responses to
27 those interrogatories for accuracy.
- 28

6. I have never been promised any compensation for performing my duties as a plaintiff and class representative, including any service award, and am aware of no interest of mine in this litigation that conflicts with the interests of other class members. I understand, however, that Class Counsel intends to request that the Court award me \$5,000 for my time and efforts on behalf of the settlement class.

Executed this 24th day of January, 2022, in Portland, Oregon.

DocuSigned by:

By: C8D045E1D725440...
Gabriel Sotelo

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY
LITIGATION

Master Docket No.: 4:20-cv-03056-DMR

**DECLARATION OF JEFFREY UMALI IN
SUPPORT OF COURT APPROVAL OF
THE SETTLEMENT**

THIS DOCUMENT RELATES TO:
ALL ACTIONS

1 I, Jeffrey Umali declare as follows:

2 1. I am one of the class representatives appointed in this case.

3 2. I submit this declaration in support of Court approval of the settlement. I have
4 personal knowledge of the facts stated herein. If called to testify to the contents of this
5 declaration, I could and would competently do so.


6 3. I voluntarily undertook the burdens and risks associated with this lawsuit to try to
7 stop Defendant's unauthorized collection and use of my private financial information as well as
8 that of other class members.

9 4. I have participated actively in this lawsuit. I have followed the status and progress
10 of the case and met in person with counsel or communicated by phone and email to stay
11 informed, including during the mediations and settlement negotiations. I will continue to do so
12 during this settlement approval process, as needed. In addition, I have also:

- 13 • helped counsel draft the amended complaint by describing to them my story and
14 relevant facts and events. As part of that process, I reviewed and provided
15 documents and information, including from my mobile device, applications I use,
16 and my financial account(s).
 - 17 • reviewed or discussed with my counsel numerous other documents related to this
18 case, including this Court's motion to dismiss order, discovery request responses,
19 the preliminary approval briefing, and the settlement.
 - 20 • searched for and provided to counsel or preserved any documents that were
21 pertinent to the case, understanding that Defendant would receive copies of
22 documents to which they were entitled, possibly even private documents,
23 including some related to my mobile device, applications I use, or my financial
24 account(s).
 - 25 • gathered and provided information relevant to the case needed to respond to
26 numerous interrogatories served by Defendant, and reviewed the responses to
27 those interrogatories for accuracy.
- 28

6. I have never been promised any compensation for performing my duties as a plaintiff and class representative, including any service award, and am aware of no interest of mine in this litigation that conflicts with the interests of other class members. I understand, however, that Class Counsel intends to request that the Court award me \$5,000 for my time and efforts on behalf of the settlement class.

Executed this 13th day of January, 2022, in Spring Valley, California.

DocuSigned by:
By: 
630E606ED4E147B...
Jeffrey Umali

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY
LITIGATION

Master Docket No.: 4:20-cv-03056-DMR

**DECLARATION OF NICHOLAS
YEOMELAKIS IN SUPPORT OF FINAL
APPROVAL OF SETTLEMENT**

THIS DOCUMENT RELATES TO:
ALL ACTIONS

1 I, NICHOLAS YEOMELAKIS declare as follows:

2 1. I am one of the class representatives appointed in this case.

3 2. I submit this declaration in support of final approval of the settlement. I have
4 personal knowledge of the facts stated herein. If called to testify to the contents of this
5 declaration, I could and would competently do so.

6 3. I voluntarily undertook the burdens and risks associated with this lawsuit to try to
7 stop Defendant's unauthorized collection and use of my private financial information as well as
8 that of other class members.

9 4. I have participated actively in this lawsuit. I have followed the status and progress
10 of the case and met in person with counsel on multiple occasions or communicated by phone and
11 email to stay informed, including during the mediations and settlement negotiations. I will
12 continue to do so during this settlement approval process, as needed. In addition, I have also:

- 13 • helped counsel draft the amended complaint by describing to them my story and
14 relevant facts and events. As part of that process, I reviewed and provided
15 documents and information, including from my mobile device, applications I use,
16 and my financial account(s).
 - 17 • reviewed and discussed with my counsel numerous other documents related to this
18 case, including this Court's motion to dismiss order, discovery request responses,
19 the preliminary approval briefing, and the settlement.
 - 20 • searched for and provided to counsel and preserved any documents that were
21 pertinent to the case, understanding that Defendant would receive copies of
22 documents to which they were entitled, possibly even private documents,
23 including some related to my mobile device, applications I use, and my financial
24 account(s).
 - 25 • gathered and provided information relevant to the case needed to respond to
26 numerous interrogatories served by Defendant, and reviewed the responses to
27 those interrogatories for accuracy.
- 28

- provided my counsel with my mobile device, which contains highly sensitive and important personal information. I agreed to allow my device to be forensically imaged, and for certain data to be extracted and provided to Defendant, in order to support my claims and this litigation generally.

5. I believe that the injunctive and monetary relief provided by the settlement, which is described in detail in the settlement agreement, offers a fair resolution of my claims against Defendant, and that implementing these changes now is preferable to continuing this litigation for a lengthy amount of time and an uncertain and possibly negative outcome. As reflected in Plaintiffs' motion for final approval, counsel is available to address all questions about the settlement, including allocation of settlement funds.

6. I have never been promised any compensation for performing my duties as a plaintiff and class representative, including any service award, and am aware of no interest of mine in this litigation that conflicts with the interests of other class members. I understand, however, that Class Counsel intends to request that the Court award me \$5,000 for my time and efforts on behalf of the settlement class.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this ¹⁰ day of January, 2022, in Charlestown, MA.

By: Nicholas Yeomelakis
NICHOLAS YEOMELAKIS